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December 6, 2011

The Honorable Joel H. Slomsky
5614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106-1797

Re: **Bart Sklar v. Christine Dallmer, et al.**
Civil Action No.: 11-3578

Dear Judge Slomsky:

In furtherance of our telephone conference on December 5, 2011 and your Order on the same date, I submit this certification in support of the amount of sanctions, I request you impose upon the Defendants for their failure to respond to Plaintiff's Request for Production of Documents – Sets I & II.

The basis of this lawsuit is for unpaid commissions and wages. Despite the fact that Defendants claim they are the ones who are owed money, they have failed to provide a scintilla of evidence in support. The amount of money owed Plaintiff and hence whether Defendants are owed any monies, can easily be ascertained by the files which Defendants must keep pursuant to law – various licensing laws governing the field of public adjusters. Inexplicably, Defendants refuse to provide those files. The most likely explanation is because the files support Plaintiff's claims and Defendants are withholding them in order to prevent Plaintiff from being able to itemize exactly what he is owed.

Based upon this, I respectfully request monetary sanctions in the amount of \$1,500.00, in part, to deter such future behavior and for the wasted time spent in preparing the motions to compel, the telephone conference on December 5, 2011 and appearing at the hearing on December 21, 2011. The approximate amount of time spent including my estimated time for the hearing on December 21, 2011 is 3.50 hours @ \$275/hour for a total of \$962.50.

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I understand that the statements made in this Certification are made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Respectfully submitted,

/s/ Kevin M. Siegel

KEVIN M. SIEGEL

cc: Jonathan Wheeler, Esquire